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ATTORNEY AT LAW

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April 13, 2022


VIA ECF

Hon. Lewis J. Liman
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

REQUEST GRANTED.

The Court approves the modification to
bail of defendant Ramirez as proposed.

4/14/2022 SO ORDERED.


LEWIS J. LIMAN
United States District Judge

Re: Request for Modification of Bail

United States v. Julianny Ramirez, 21 Mag. 11366

Dear Judge Liman:

Julianny Ramirez is currently at liberty on a \$75,000.00 Personal Recognizance Bond, signed by three financially responsible persons, and with conditions of release that include an ankle bracelet and Stand Alone Monitoring, which allows Pretrial to create, via software and GPS equipment, an "inclusion/exclusion zone" that alerts if the defendant goes outside of his permitted travel area. Currently Mr. Ramirez's permitted travel area is the Southern and Eastern Districts of New York, the District of New Jersey, and the District of Connecticut.

Mr. Ramirez's job as a truck driver normally requires him to drive throughout the Northeast Corridor to deliver goods, not just the Tri-State area currently allowed. With the curtailment of his route, he cannot make enough money to support his truck (loan payments, insurance, and gas) as well as his own personal needs.

Because of this, I respectfully request that Mr. Ramirez's permitted travel area be expanded to include all of New York State, New Jersey, Connecticut, Pennsylvania, Delaware, Massachusetts, and Maryland.

I have discussed this situation with Pretrial Services and with Assistant United States Attorney Edward C. Robinson, the government prosecutor currently on the case. Both consent to the modification.

Respectfully,

s/s Camille M. Abate
Camille M. Abate, Esq.

cc: AUSA Edward Robinson (via ECF)

